

U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
ELECTRONICALLY FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

FILED: 29 APR 2010

GANESH BAULIA, MD. JACKIR
HOSSAIN, MD. FARUQ HOSSEN, MD.
ISLAM, MD. SAIFUL ISLAM, MD.
ABDUL KARIM, SARKAR KUMARESH,
MD. PERVEZ, MD. NASIR UDDIN, MD.
SADDIQR RAHMAN, on behalf of
themselves and other employees similarly
situated,

Plaintiffs,

v.

COOKSTON ENTERPRISES, INC., d/b/a
Domino's Pizza, MUMBUH STYLE PIZZA,
INC., d/b/a Domino's Pizza, HAT TRICK
PIZZA, INC., ROB COOKSTON, NUR
MOHAMED, JOHN DOES 1-100, the actual
names of such individuals or entities being
unknown,

Defendants.

Civil Action No.09-cv-8841 (GBD)

***PROPOSED CIVIL CASE
MANAGEMENT PLAN AND
SCHEDULING ORDER***

After consultation with counsel for the parties, the following case management plan is adopted. This plan is also a scheduling order pursuant to Rules 16 and 26(f) of the Federal Rules of Civil Procedure.

1. Pre-Trial Disclosures. Parties shall exchange the information required by Rule 26(a)(1) of the Federal Rules of Procedure by **March 12, 2010**.

2. Discovery Plan. The parties discussed the subjects on which they believe discovery is initially necessary and jointly propose the following discovery plan.

- a. No additional parties, except for good cause, may be joined after **March 31, 2010.**
- b. No amendment to the pleadings, except for good cause, shall be permitted after **March 31, 2010.**
- c. Interrogatories for current named parties are to be served by all counsel no later than **May 7, 2010.** The responses to all interrogatories shall be served in accordance with the Federal Rules of Civil Procedure. The provisions of Local Civil Rule 33.1 shall apply.
- d. First request for the production of documents for current named parties, if any, shall be served no later than **May 7, 2010.** The response to all requests for production of documents shall be served in accordance with the Federal Rules of Civil Procedure.
- e. Motion to facilitate collective action notice shall be filed no later than **May 31, 2010.**
- f. Class certification discovery shall be completed by **June 11, 2010.**
- g. Motion for class certification shall be filed by **June 28, 2010.**
- h. Identification of plaintiffs' experts shall be made by **July 16, 2010.**
- i. Identification of defendants' experts shall be made by **July 16, 2010.**
- j. Fact depositions shall be completed by **August 13, 2010.**
- k. Fact discovery shall be completed by **September 3, 2010.**
- l. Experts' reports shall be served by **July 30, 2010.**

m. Rebuttal experts' reports shall be served by **August 30, 2010**.

n. Expert discovery shall be completed by **September 17, 2010**.

3. Dispositive motions shall be served by **October 1, 2010**. Answering papers are to be served within 14 days. Reply papers are to be served within 7 days. In the event a dispositive motion is made, the date for submitting the Joint Pretrial Order shall be changed from that shown herein to three (3) weeks from the decision on the motion unless otherwise ordered by the Court. The final pretrial conference shall be adjourned for a date four (4) weeks from the decision on the dispositive motion.

4. A final pre-trial conference will be held on _____, 2010 at 9:30 a.m.


5. The Joint Pretrial Order shall be filed no later than 30 days after the final pretrial conference. The requirements for the pretrial order and other pretrial submissions shall be governed by the Court's Individual Rules of Practice.

6. All motions and applications shall be governed by the Court's Individual Rules of Practice.

7. The parties shall be ready within 1 week's notice on or after _____. The estimated trial time is _____ days, and this is a jury trial.

8. The next case management conference will be held on Aug 4, 2010 at 9:30 a.m.

So Ordered, 29 APR 2010




GEORGE B. DANIELS, U.S.D.J.
HON. GEORGE B. DANIELS

DATED: March 9, 2010



Attorneys for Plaintiffs



Attorneys for Defendants